

QUESTION 5. Please update on any plans for adding additional fields (other than Hunting) to the parsed CSR functionality, and specifically state whether any have been proposed in change management.

ANSWER

The following additional fields for parsed CSR were proposed through the CCP via Change Requests (CR) CR0651 and CR0652.

CR0651 - The fields listed below will be translated to provide Hunting information in an LSOG4 format to CLECs, and will be implemented via CR0651. Change Control voted to include this CR in Release 10.4. The production date for Release 10.4 is March 23, 2002.

Field Name	Field Description	LSOG 4 Definition
HNTYP	Hunting Type Code	Identifies the type of hunting involved (e.g. sequential);
HTSEQ	Hunting Sequence	Identifies the hunting sequence of numbers in the hunt group;
NOTYP	Number Type	Identifies the number (TER (terminal), or TN (telephone number)) entered in the HT field; additional field "Additional field" was added to differentiate this field from the HNTYP and HTSEQ, which were originally requested by the CLECs.
TLI	Telephone Line Identifier	Identifies the pilot (first) number of a multi-line hunt group; additional field
HT	Hunting Telephone Number	Identifies the hunting number for this sequence (specified in HTSEQ) in the hunt group; additional field

Purpose of Fields:

The fields listed above are used in various combinations by the CLECs in defining Hunting service for end users. Hunting is offered for business or consumer subscribers. Business subscribers utilize hunting most frequently.

CR0652 - Data for the following fields, if they exist on the CSR, will be translated to an LSOG4 format (LSR field values) and will be implemented via CR0652. The production date will be determined by the ranking given during the Change Control Prioritization Meeting to be held March 27, 2002.

Field Name	Field Description	LSOG 4 Definition
TOA	Type of Account	Identifies the type of account for directory listing purposes
BRO	Business/Residence Placement Override	Identifies an override of the normal placement of business or residence directory listing placement.

DGOUT	DID Digits Out	Indicates the number of digits out pulsed from the central office to the customer's (end user's) equipment
TOS	Type of Service	Identifies the type of service. The type of service identifies the end user account as business, residential, or government.
STYC	Style Code	Identifies whether the listing is a straight line, caption, etc.
LNPL	Listed Name Placement	Identifies the placement of the listing based on the listed name – last name (LNLN) field

Purpose of Fields:

The TOS field is used on LSRs based on Request Type/Activity Type combinations. TOS submitted by the CLECs are for the services ordered. TOS returned on Parsed CSR is the existing TOS derived from the IDENT Data (information on the CSR that is stored in CRIS and is not part of the CSR. This information is returned in a section named IDENT Data and includes such information as the account number, exchange, basic class of service and type.) of the CSR. If the CLEC changes the type of service on the LSR, then the TOS may not be the same as the TOS mapped from the CSR. For example, a TOS for Business would be "1" and a TOS for COIN would be "4".

The TOA and STYC fields may be utilized for new listings.

The LNPL and BRO fields are utilized for special placement of listings. BRO overrides the normal placement of business listings, for example, "B" would place listing only in the business section in directory and directory assistance. "R" would place listing only in the residence section in directory and directory assistance. LNPL identifies the placement of a listing based on the LNLN field.

Example:

M;*K*P places the listing near the beginning of the M section. M*K*P; would place the listing lower in M section alphabetically as a word. The semi-colon determines the placement. When the semi-colon is found after the first letter of the finding word for a listed name, then LNPL = L (for letter placement)

ATTACHMENT 6

QUESTION 6:

- a. Please explain what products are included in the catch-all buckets.
- b. Please provide disaggregated data for the UNE category with greatest volume for Oct-Nov.
- c. Please explain the disparity between retail and wholesale performance for OCI timeliness (B.2.1.4.1.1)
- d. Please explain the disparity between retail and wholesale performance for "percent repeat trouble within 30 days".

ANSWER:

a. There are three catch-all buckets: UNE Combo Other; UNE Other Design; and UNE Other Non-Design. The UNE Combo Other product disaggregation contains ordered combinations of UNEs. Enhanced Extended Loops (EELs) are included in UNE Combo Other. The UNE Other Design product disaggregation contains such products such as UNE DS1 Local Loop, UNE DS3 Local Loop, Non-Channelized Local Loop and some 60 other products. The UNE Other Non-Design product disaggregation includes stand alone Directory Listing and such non-design UNEs as Network Terminating Wire, Sub Loop Distribution and Unbundled Sub Loop. The Attachment contains a complete list of products for each bucket.

b. In the category UNE Combo Other for October and November 2001, 100% of the orders received (Oct-192 and Nov-178) were Non-Switched Combos made up mostly of EELs. EELs are *designed* and, therefore, require a somewhat longer interval to provision. The Order Interval Guide for EELs lists intervals from 5 to 27 days depending on the type of EEL. The retail analog, Residence, Business and Design Dispatch, (Oct-60,761 and Nov-52,696) consists of a large number of *non-designed* residence and business orders (October 58,569 and Nov-50,972) with short intervals and a much smaller number of *designed* orders with longer intervals (Oct-2,192 and Nov-1,724) resulting in an overall short interval.

c. As shown from the data above, the disparity results from the use of a retail analog whose product mix, consisting predominately of non-designed products, in practice skews the results to a short interval compared with essentially one product, EELs, which, being designed, produces a longer interval.

Measurements are continually refined and modified, typically as a part of public service commission sponsored review of measurements and standards. The GPSC sponsored a series of industry workshops to review the measurements ordered by the Commission in its January 2001 Order. These workshops started in October 2001 with subsequent workshops in November and December 2001. In the workshops, CLECs proposed a separate product disaggregation for EELs.

In these same workshops, BellSouth agreed with the CLECs that separate reporting EELs is appropriate because the activity for EELs warrants their being an individual product disaggregation rather than being a part of a broad

group. The retail analog for the OCI for EELs is still a topic for discussion in the Georgia proceeding. A decision by the Commission is expected in the near future.

d. We explain the disparity between retail and wholesale performance for “percent repeat trouble within 30 days” in our response to QUESTION 8.

ATTACHMENT

PROD ID	PMAP_PROD_DESC	PROD
141	UNE Other Non-Design	UNE 2W/4W Unbundled Copper Loop (UCL-ND) Non-Design
141	UNE Other Non-Design	UNE Network Terminating Wire (NTW)
141	UNE Other Non-Design	UNE Network Interface Devices (NID) - NID 1.. NID 6
141	UNE Other Non-Design	UNE Sub-Loop Distribution - 2W/4W Voice Grade Sub-Loop
141	UNE Other Non-Design	UNE Sub-Loop Intra-building Network Cable - 2W/4W Voice Grade Sub-Loop
141	UNE Other Non-Design	UNE Copper Sub-Loop - 2W/4W
142	UNE Other Design	UNE 4W Analog Loop (Ground Start) w/o NP
142	UNE Other Design	UNE 4W Analog Loop (Loop Start) w/o NP
142	UNE Other Design	UNE DS1 Non-Channelized Local Channel
142	UNE Other Design	UNE DS3 Non-Channelized Local Channel
142	UNE Other Design	UNE STS-1 Non-Channelized Local Channel
142	UNE Other Design	UNE DS1 Channelized Local Channel
142	UNE Other Design	UNE DS3 Channelized Local Channel
142	UNE Other Design	UNE STS-1 Channelized Local Channel
142	UNE Other Design	UNE DS1 Channelization (1/0 Mux)
142	UNE Other Design	UNE DS3 Channelization (3/1 Mux)
142	UNE Other Design	UNE STS-1 Channelization (3/1 Mux)
142	UNE Other Design	UNE Dedicated Transport - Dark Fiber Local Loop
142	UNE Other Design	UNE Dedicated Transport - Dark Fiber Local Channel
142	UNE Other Design	UNE Dedicated Transport - Dark Fiber Interoffice Channel
142	UNE Other Design	UNE Sub-Loop Feeder - 2W Voice Loop (Ground Start)
142	UNE Other Design	UNE Sub-Loop Feeder - 2W Voice Loop (Loop Start)
142	UNE Other Design	UNE Sub-Loop Feeder - 2W Voice Loop (Reverse Battery)
142	UNE Other Design	UNE Sub-Loop Feeder - 4W Voice Loop (Ground Start)
142	UNE Other Design	UNE Sub-Loop Feeder - 4W Voice Loop (Loop Start)
142	UNE Other Design	UNE Sub-Loop Feeder - 4W Unbundled Digital Loop - 2.4kbps
142	UNE Other Design	UNE Sub-Loop Feeder - 4W Unbundled Digital Loop - 4.8kbps
142	UNE Other Design	UNE Sub-Loop Feeder - 4W Unbundled Digital Loop - 9.6kbps
142	UNE Other Design	UNE Sub-Loop Feeder - 4W Unbundled Digital Loop - 19.2kbps
142	UNE Other Design	UNE Sub-Loop Feeder - 4W Unbundled Digital Loop - 56kbps
142	UNE Other Design	UNE Sub-Loop Feeder - 4W Unbundled Digital Loop - 64kbps
142	UNE Other Design	UNE Sub-Loop Feeder - 2W ISDN Loop (Basic Rate)
142	UNE Other Design	UNE Sub-Loop Feeder - DS1 Local Loop
142	UNE Other Design	UNE Sub-Loop Feeder - 2W Unbundled Copper Loop
142	UNE Other Design	UNE Sub-Loop Feeder - 4W Unbundled Copper Loop (UCL)
142	UNE Other Design	UNE Sub-Loop Feeder - 2W UDC (Universal Digital Channel) Capable Loop
142	UNE Other Design	UNE Loop Concentration - TR008 Non-Concentrated System AMI/SF
142	UNE Other Design	UNE Loop Concentration - TR008 Non-Concentrated System B8ZS/SF
142	UNE Other Design	UNE Loop Concentration - TR008 Non-Concentrated System B8ZS/ESF

PROD ID	PMPROD_DESC	PROD
142	UNE Other Design	UNE Loop Concentration - TR008 Concentrated System AMI/SF
142	UNE Other Design	UNE Loop Concentration - TR008 Concentrated System B8ZS/SF
142	UNE Other Design	UNE Loop Concentration - TR008 Concentrated System B8ZS/ESF
142	UNE Other Design	UNE Loop Concentration - TR303 System (Concentrated or Non-Concentrated) B8ZS/ESF
142	UNE Other Design	UNE 2W Voice Loop (Ground Start) Riding ULC System
142	UNE Other Design	UNE 2W Voice Loop (Loop Start) Riding ULC System
142	UNE Other Design	UNE 2W Voice Loop (Reverse Battery) Riding ULC System
142	UNE Other Design	UNE 4W Voice Loop (Ground Start) Riding ULC System
142	UNE Other Design	UNE 4W Voice Loop (Loop Start) Riding ULC System
142	UNE Other Design	UNE 4W Unbundled Digital Loop - 2.4kbps Riding ULC System
142	UNE Other Design	UNE 4W Unbundled Digital Loop - 4.8kbps Riding ULC System
142	UNE Other Design	UNE 4W Unbundled Digital Loop - 9.6kbps Riding ULC System
142	UNE Other Design	UNE 4W Unbundled Digital Loop - 19.2kbps Riding ULC System
142	UNE Other Design	UNE 4W Unbundled Digital Loop - 56kbps Riding ULC System
142	UNE Other Design	UNE 4W Unbundled Digital Loop - 64kbps Riding ULC System
142	UNE Other Design	UNE 2W ISDN (Basic Rate) Loop Riding ULC System
142	UNE Other Design	UNE 2W UDC (Universal Digital Channel) Capable Loop Riding ULC System
142	UNE Other Design	UNE Remote Site Unbundled DSL (RSUDSL) ATM DS1 Interface - 1.536 Mbps
142	UNE Other Design	UNE Remote Site Unbundled DSL (RSUDSL) ATM DS3 Interface - 44.210 Mbps
142	UNE Other Design	UNE Sub-Loop Feeder - DS3 Loop
142	UNE Other Design	UNE Sub-Loop Feeder - STS-1 Loop
142	UNE Other Design	UNE Sub-Loop Feeder - OC-3 2 Fiber Loop
142	UNE Other Design	UNE Sub-Loop Feeder - OC-3 4 Fiber Loop
142	UNE Other Design	UNE Sub-Loop Feeder - OC-12 2 Fiber Loop
142	UNE Other Design	UNE Sub-Loop Feeder - OC-12 4 Fiber Loop
142	UNE Other Design	UNE Sub-Loop Feeder - OC-48 2 Fiber Loop
142	UNE Other Design	UNE Sub-Loop Feeder - OC-48 4 Fiber Loop
190	UNE Combo Other	UNE 2W Voice Loop (Ground Start) Riding DS1 Interoffice Channel - EEL-1
190	UNE Combo Other	UNE 2W Voice Loop (Loop Start) Riding DS1 Interoffice Channel - EEL-1
190	UNE Combo Other	UNE 2W Voice Loop (Reverse Battery) Riding DS1 Interoffice Channel - EEL-1
190	UNE Combo Other	UNE 4W Voice Loop (Ground Start) Riding DS1 Interoffice Channel - EEL-2
190	UNE Combo Other	UNE 4W Voice Loop (Loop Start) Riding DS1 Interoffice Channel - EEL-2
190	UNE Combo Other	UNE 2W ISDN Loop (Basic Rate) Riding DS1 Interoffice Channel - EEL-3
190	UNE Combo Other	UNE 4W Unbundled Digital Loop - 56kbps Riding DS1 Interoffice Channel - EEL-4
190	UNE Combo Other	UNE 4W Unbundled Digital Loop - 64kbps Riding DS1 Interoffice Channel - EEL-5
190	UNE Combo Other	UNE DS1 Loop Riding DS1 Interoffice Channel - EEL-6
190	UNE Combo Other	UNE DS3 Loop Riding DS3 Interoffice Channel - EEL-7
190	UNE Combo Other	UNE STS-1 Loop Riding STS-1 Interoffice Channel - EEL-8
190	UNE Combo Other	UNE DS1 Loop Riding DS3 Interoffice Channel - EEL-9

PROD ID	PMAP_PROD_DESC	PROD
190	UNE Combo Other	UNE DS1 Loop Riding STS-1 Interoffice Channel - EEL-10
190	UNE Combo Other	UNE 2W Voice Loop (Ground Start) Riding 2W Voice Grade Interoffice Channel - EEL-11
190	UNE Combo Other	UNE 2W Voice Loop (Loop Start) Riding 2W Voice Grade Interoffice Channel - EEL-11
190	UNE Combo Other	UNE 2W Voice Loop (Reverse Battery) Riding 2W Voice Grade Interoffice Channel - EEL-11
190	UNE Combo Other	UNE 4W Voice Loop (Ground Start) Riding 4W Voice Grade Interoffice Channel - EEL-12
190	UNE Combo Other	UNE 4W Voice Loop (Loop Start) Riding 4W Voice Grade Interoffice Channel - EEL-12
190	UNE Combo Other	UNE 4W Unbundled Digital Loop - 56kbps Riding 4W 56kbps Interoffice Channel - EEL-13
190	UNE Combo Other	UNE 4W Unbundled Digital Loop - 64kbps Riding 4W 64kbps Interoffice Channel - EEL-14
190	UNE Combo Other	UNE 2W Voice Grade Local Channel (Ground Start) + 2W VG Interoffice + 2W VG Loop
190	UNE Combo Other	UNE 2W Voice Grade Local Channel (Loop Start) + 2W VG Interoffice + 2W VG Loop
190	UNE Combo Other	UNE 2W Voice Grade Local Channel (Reverse Battery) + 2W VG Interoffice + 2W VG Loop
190	UNE Combo Other	UNE 4W Voice Grade Local Channel (Ground Start) + 4W VG Interoffice + 4W VG Loop
190	UNE Combo Other	UNE 4W Voice Grade Local Channel (Loop Start) + 4W VG Interoffice + 4W VG Loop
190	UNE Combo Other	UNE 4W 56kbps Local Channel + 4W 56kbps Interoffice + 4W 56kbps Local Loop
190	UNE Combo Other	UNE 4W 64kbps Local Channel + 4W 64kbps Interoffice + 4W 64kbps Local Loop
190	UNE Combo Other	UNE DS1 Local Channel + DS1 Interoffice + DS1 Local Loop
190	UNE Combo Other	UNE DS3 Local Channel + DS3 Interoffice + DS3 Local Loop
190	UNE Combo Other	UNE STS-1 Local Channel + STS-1 Interoffice + STS-1 Local Loop
190	UNE Combo Other	UNE 2W Voice Grade Local Loop (Ground Start) + 2W VG Interoffice w existing 1/0 Mux Channelized Local Channel
190	UNE Combo Other	UNE 2W Voice Grade Local Loop (Loop Start) + 2W VG Interoffice w existing 1/0 Mux Channelized Local Channel
190	UNE Combo Other	UNE 2W Voice Grade Local Loop (Reverse Battery) + 2W VG Interoffice w existing 1/0 Mux Channelized Local Channel
190	UNE Combo Other	UNE 4W Voice Grade Local Loop (Ground Start) + 4W VG Interoffice w existing 1/0 Mux Channelized Local Channel
190	UNE Combo Other	UNE 4W Voice Grade Local Loop (Loop Start) + 4W VG Interoffice w existing 1/0 Mux Channelized Local Channel
190	UNE Combo Other	UNE DS1 Local Loop + DS1 Interoffice w existing 3/1 Mux (DS3) Channelized Local Channel
190	UNE Combo Other	UNE DS1 Local Loop + DS1 Interoffice w existing 3/1 Mux (STS-1) Channelized Local Channel
190	UNE Combo Other	UNE DS1 Local Loop w existing 3/1 Mux (DS3) Channelized Local Channel
190	UNE Combo Other	UNE DS1 Local Loop w existing 3/1 Mux (STS-1) Channelized Local Channel
190	UNE Combo Other	UNE DS1 Interoffice Channel w existing 3/1 Mux (DS3) Channelized Local Channel
190	UNE Combo Other	UNE DS1 Interoffice Channel w existing 3/1 Mux (STS-1) Channelized Local Channel
190	UNE Combo Other	UNE DS1 Local Loop + DS1 Interoffice w 3/1 Mux (DS3) Collocated

PROD ID	PMAP_PROD_DESC	PROD
		Channelization
190	UNE Combo Other	UNE DS1 Local Loop + DS1 Interoffice w 3/1 Mux (STS-1) Collocated Channelization
190	UNE Combo Other	UNE DS1 Local Channel + DS1 Local Loop
190	UNE Combo Other	UNE DS3 Local Channel + DS3 Local Loop
190	UNE Combo Other	UNE STS-1 Local Channel + STS-1 Local Loop
190	UNE Combo Other	UNE DS1 Local Channel + DS1 Local Interoffice Channel to Collocation
190	UNE Combo Other	UNE DS3 Local Channel + DS3 Local Interoffice Channel to Collocation
190	UNE Combo Other	UNE STS-1 Local Channel + STS-1 Local Interoffice Channel to Collocation
190	UNE Combo Other	UNE Channelized DS1 Local Channel + DS1 Local Interoffice w 1/0 Mux Channelization
190	UNE Combo Other	UNE Channelized DS3 Local Channel + DS3 Local Interoffice w 3/1 Mux Channelization
190	UNE Combo Other	UNE Channelized STS-1 Local Channel + STS-1 Local Interoffice w 3/1 Mux Channelization
190	UNE Combo Other	UNE 2W Voice Grade Local Channel (Ground Start) w existing 1/0 Mux Channelized Interoffice Channel
190	UNE Combo Other	UNE 2W Voice Grade Local Channel (Loop Start) w existing 1/0 Mux Channelized Interoffice Channel
190	UNE Combo Other	UNE 2W Voice Grade Local Channel (Reverse Battery) w existing 1/0 Mux Channelized Interoffice Channel
190	UNE Combo Other	UNE 4W Voice Grade Local Channel (Ground Start) w existing 1/0 Mux Channelized Interoffice Channel
190	UNE Combo Other	UNE 4W Voice Grade Local Channel (Loop Start) w existing 1/0 Mux Channelized Interoffice Channel
190	UNE Combo Other	UNE DS1 Local Channel w existing 3/1 Mux (DS3) Channelized Interoffice Channel
190	UNE Combo Other	UNE DS1 Local Channel w existing 3/1 Mux (STS-1) Channelized Interoffice Channel
190	UNE Combo Other	UNE DS1 Interoffice Channel w existing 3/1 Mux (DS3) Independent Local Loop Channelization
190	UNE Combo Other	UNE DS1 Interoffice Channel w existing 3/1 Mux (STS-1) Independent Local Loop Channelization
190	UNE Combo Other	UNE DS1 Interoffice Channel w 1/0 Mux Channelization
190	UNE Combo Other	UNE DS3 Interoffice Channel w 3/1 Mux Channelization
190	UNE Combo Other	UNE STS-1 Interoffice Channel w 3/1 Mux Channelization
190	UNE Combo Other	UNE DS1 Local Channel w 1/0 Mux Channelization
190	UNE Combo Other	UNE DS3 Local Channel w 3/1 Mux Channelization
190	UNE Combo Other	UNE STS-1 Local Channel w 3/1 Mux Channelization
190	UNE Combo Other	UNE DS1 1/0 Mux Collocation w Channelization
190	UNE Combo Other	UNE DS3 3/1 Mux Collocation w Channelization
190	UNE Combo Other	UNE STS-1 3/1 Mux Collocation w Channelization

ATTACHMENT 7

QUESTION 7. Metric 2.19.19.1.1, capturing provisioning troubles within 30 days for digital loops does not reflect "found oks." Please determine the percentage of orders for which "no trouble" was found for October and November 2001 (*i.e.*, recalculate metric for these months as Verizon does).

ANSWER

The metric for Provisioning Troubles w/in 30 Days (2.19.19.1.1) in GA would change in Oct. 2001 from 10.34% CLEC trouble reports to 6.90% when the 5 trouble reports for which no trouble was found are excluded
In Nov. 2001 the metric for (2.19.19.1.1) in GA would change from 6.51% CLEC trouble reports to 5.33% when the 2 trouble reports for which no trouble was found are excluded.

ATTACHMENT 8

QUESTION 8: Please explain the disparity between retail and wholesale performance for the following measures in Georgia:

- a. Missed Repair Appointments (3.1.9.2)
- b. Percent Repeat Troubles (3.4.9.2).

ANSWER

a. Georgia % Missed Repair Appointments (B.3.1.9.2)

The majority of the trouble reports associated with the 2W Analog Loop Non-Design product fall into the dispatch category. For the months of October, November and December 2001, the CLEC volume for the non-dispatch trouble reports was 21, 13 and 20, respectively, with only two appointments missed in each month. The major reason for the disparity with the retail analogue is the small volume of CLEC reports. In October, there were 2 missed appointments among the 21 scheduled, or 9.52%. The CLEC volume fell to 13 reports in November with 2 missed, or 15.38% and in December, the volume was 20 reports with 2 missed, or 10%. The retail analogue in each of the three-month period had over five hundred missed appointments out of a monthly volume of approximately 30,000 reports, or between 1.75% to 2.03% missed appointments.

A detailed analysis for each of the 6 missed appointments indicated that all 6 missed appointments were due to a scheduling program called "Auto Core." The Work Force Administration (WFA) system runs a program called Auto Core to correlate any known cable troubles with customer trouble reports. This program automatically schedules the customer trouble report to complete based on the date and time the cable trouble is scheduled for completion. This provides the customer with the most realistic repair time based on the cable repair schedule. However, these six trouble reports were not due to a cable problem and should have been "detached" from the Auto Core program and given a separate schedule based on the information furnished with the trouble report. When the cable troubles were completed, these 6 customer trouble reports were not repaired and required further work, thus each missed the scheduled appointment date set up by Auto Core. The Work Management Centers (WMCs) have refocused their efforts to make sure any report that is not associated with current cable problems is detached and scheduled without reliance on Auto Core.

January 2002 reported results for this sub-metric show 0 missed appointments for the 26 non-dispatched appointments scheduled, exceeding the retail analogue comparison with 0.00% compared to 1.06% for the retail analogue.

(b) Georgia % Repeat Troubles within 30 days (B.3.4.9.2)

As indicated in the previous discussion for % Missed Repair Appointments, the majority of the repeat trouble reports for the 2W Analog Loop Non Design sub-metric are in the dispatch category. With only 21, 13 and 20 non-dispatch reports in October, November and December 2001, respectively, the major reason for the disparity with the retail analogue is the small volume of CLEC reports. In October, 6 of the 21 CLEC reports were repeat reports, with this sub-metric meeting the -1.645 z-score fixed critical value. In November, 5 of the 13 (38.46%) CLEC reports were classified as repeats, with 6 of the 20 (30.0%) reports in December being repeated. These were compared with the retail analogue results of 16.80% and 14.60% for November and December, respectively. In October, 4 of the 6 repeat reports were closed as test ok / found ok (TOK / FOK). In November 2 of the 5 repeats and in December 2 of the 6 repeats were closed as TOK / FOK. The remaining 3 reports in November and 4 reports in December did not reveal any systemic issues during the raw data analysis.

January 2002 results exceeded the retail analogue comparison for this sub-metric with 1 repeat report for the 26 non-dispatched reports taken, or 3.85%, compared with the retail analogue rate of 14.61%. The one repeat report was closed as a FOK.

ATTACHMENT 9

Question 9. MCI has indicated that there is a LESOG problem with incorrect due dates for Supplemental LSRs, or Supp LSRs. MCI indicated that they understand a fix is set for April. Apparently, the due date provided for each Supp LSR is the original due date rather than the new due date that the Supp LSR should have triggered. WorldCom has said that it was told by BellSouth that it was a problem with LESOG and WorldCom indicated that the problem was not announced as a problem through change management. Please provide an update on the MCIW's issue regarding LESOG supplemental due dates and any negotiations or efforts to fix the problem.

Answer

On January 8, 2002 MCI sent a memo to BellSouth indicating a BellSouth problem on supplemental orders for which the modified due date was not being returned on the FOC. On January 14, 2002, BellSouth informed MCI that there is a LESOG problem the led to issuance of FOCs with incorrect due dates for Supp 03 LSRs. A Supp 03 LSR is one that requests changes to the original LSR other than a due date change and may also include a due date change. Originally the defect was slated to be corrected in release 10.4 on April 6, 2002. The defect is still scheduled to be corrected in that release; the new date for the release, however, is now March 23, 2002. The defect was identified and documented through change management as Change Request 0620. Following are the details surrounding this change request:

MCI sent an email with several PONS to the BellSouth Account Team on January 8, 2002 asking what could be done about BellSouth's sending the wrong due dates back on FOCs for supplemental orders. On January 14, 2002, Electronic Control (EC) support responded back to MCI that the example PONS had been sent to LEO support on Friday January 11 for investigation. LEO support advised EC support that there was a defect in LESOG. On January 15, 2002, EC Support sent a message to the Change Control Process (CCP) with information on the defect. On January 17, 2002, CCP sent the defect through the process to validate the defect with the appropriate impact level and assigned a Medium (M) level to the request. CCP opened change request 0620. The change request initially reflected "LESOG is failing to return the new DD (due date) on FOC for REQTYP J (listings) with a SUP3." BellSouth sent out a daily activity report that reflected this change request.

Upon further investigation on January 21, 2002, BellSouth determined that the defect impacts more than REQTYP J and can occur on any REQTYP with a SUP 03. On January 24, 2002, EC Support notified CCP that the verbiage on the website needed to be revised. CR0620 was revised to read "LESOG is failing to return the new DD on FOC for REQTYP J (listings) on SUPs. This defect can affect all REQTYPs with a SUP3." CR0620 also reflected that BellSouth has determined that this is a defect and will be corrected in Release 10.4 on 4/06/02. The change request was posted to the web site. On March 1, 2002, CCP updated the web site with the new March 23rd due date for Release 10.4.

ATTACHMENT 10

QUESTION 10. Please describe any escalation processes in place to which CLECs can turn and that are timely and easy to use.

ANSWER

BellSouth has in place and follows the escalation procedure that is clearly defined in the Change Control Process Document attached (current Version 2.7, Section 8.0 – Escalation Process). As agreed to by BellSouth and the CLECs, this escalation procedure includes timelines for escalation responses and names/titles of individuals to whom CLECs may appropriately escalate issues (1st, 2nd and 3rd levels within different areas within which escalations might occur). BellSouth managers at the 3rd level have broad decision-making authority within their areas of responsibility and understand the use of further escalation within the company in situations where issues cannot be satisfactorily closed, and, in fact, have used such measures. Fortunately, this has been necessary in only a few instances. Further in the same Section, the CCP Document clearly defines the rights of both CLECs and BellSouth to take issues beyond the CCP escalation procedures, by invoking dispute resolution procedures before the appropriate state public service commission. These include seeking state commission mediation or filing a complaint with the state commission to resolve any disputed issues that cannot be satisfactorily closed through the escalation procedures. In addition, BellSouth has proposed through change management that the Network Vice President for Wholesale Operations, Trip Agerton, be added to the escalation lists in CCP.

BellSouth and the CLECs agreed to the current escalation and dispute resolution procedures under the CCP, and several state commissions have endorsed the reasonableness of these procedures. See Final Order on Arbitration, *In re: Petition of AT&T Communications of the Southern States, Inc., et al., for Arbitration of Certain Terms and Conditions of Proposed Agreement With BellSouth Telecommunications, Inc.*, Docket No. 000731-TP, Order No. PSC-01-1402-FOF-TP, at 120 (June 28, 2001) (finding that the dispute resolution process under the CCP is “equitable, well-defined and inclusive”); Order, *In re: Petition of AT&T Communications of the Southern States, Inc., et al., for Arbitration of Certain Terms and Conditions of Proposed Agreement With BellSouth Telecommunications, Inc.*, Docket 11853-U, at 14 (April 20, 2001) (finding that “[i]f parties have disputes arising from the CCP, then they should adhere to the escalation and dispute resolution process included in the CCP Document”).

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CHANGE CONTROL PROCESS

CCP12_07.DOC
Version 2.7
December 7, 2001

Version 2.7
Issued Date: December 7, 2001

Jointly Developed by the Change Control Sub-team comprised of
BellSouth and CLEC Representatives

8.0 ESCALATION PROCESS

Guidelines

- The ability to escalate is left to the discretion of the CLEC based on the severity of the missed or unaccepted response/resolution.
- Escalations can involve issues related to the Change Control process itself.
- For change requests, the expectation is that escalation should occur only after normal Change Control procedures (i.e., communication timelines) have occurred per the Change Control agreement.
- Three (3) levels of escalation will be used.
- For Type 1 issues, the escalation process is agreed to allow BellSouth a one (1) day turnaround for each cycle of escalation
- For Types 2-5 issues, the escalation process is agreed to allow BellSouth a five (5) day turnaround for each cycle of escalation (excludes expedites)
- For Type 6 High Impact Issues, the escalation process is agreed to allow BellSouth a one (1) day turnaround to provide a status for each cycle of escalation. For Type 6 Medium and Low Impact issues, the escalation process is agreed to allow BellSouth a 2-5 day turnaround to provide a status for each cycle of escalation.
- For Types 2-5 Expedite Process issues, the escalation process is agreed to allow BellSouth a three (3) day turnaround to provide a status for each cycle of escalation.
- Each level will go through the same Cycle, which is described below.
- All escalation communications may be optionally distributed by the CLEC to the industry and BellSouth Change Control email unless there is a proprietary issue.

Cycle for Type 1 System Outages

Contact List for Escalation: ECS Group – Type 1 Changes

NOTE: If the originator does not receive a call back from the EC Support Group according to the times specified in this document, they may escalate according to the following list:

Escalation Level	Name and Title	Office Number	Pager Number	Email Address
1 st Level	Byron Franklin Manager – EC Support Group Interconnection Operations	205-733-5400	1-800-862-0399 PIN 17264913	Byron.Franklin@bridge.bellsouth.com
2 nd Level	Bruce Smith Operations Director EC Support Group Interconnection Operations	205-988-7211	1-800-542-3260	Bruce.Smith@bridge.bellsouth.com
3 rd Level	Lynn Smith Operations Assistant Vice President Interconnection Operations	205-714-0010	N/A	Lsmith12@imcingular.com Lynn.A.Smith@bridge.bellsouth.com

NOTE: If a call is escalated without first attempting to contact the ECS Helpdesk, the caller will be referred back to the ECS Helpdesk.

Escalation Cycle for Types 2-6 Change Requests

Guidelines

- Item must be formally escalated as an email sent to the appropriate escalation level within BellSouth with a copy to the industry and BellSouth Change Control email.
- Subject of email must be CLEC (CLEC Name) ESCALATION –CR#, if applicable, Level of Escalation, unless it is proprietary.
- Content of email must include:
 - Definition and escalation of item
 - History of item
 - Reason for escalation
 - Desired outcome of CLEC

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- Impact to CLEC of not meeting the desired outcome or item remaining on current course of action as previously discussed at the Change Control Meeting for enhancements.
 - Contact information for appropriate Level including Name, Title, Phone Number, and Email ID.
 - For escalation Level 2, forward original email and include any additional information including the reason that the matter could not be resolved at Level 1.
 - For escalation Level 3, forward original email and include any additional information including the reason that the matter could not be resolved at Levels 1 and 2.
 - BellSouth will reply to escalation request with acknowledgment of receipt within four (4) hours and begin the escalation process through Level of escalation.
 - The escalating CLEC should respond to BellSouth within five (5) days as to whether escalation will continue or the BellSouth response has been accepted as closure to the item.
 - If the BellSouth position suggest a change in the current disposition of the item (i.e., what has already been communicated to the industry), a conference call will be held within one (1) business day of the BellSouth decision in order to provide industry notification with the appropriate executives.
 - BellSouth will publish the outcome of the conference call to the industry via web.
 - If unsatisfied with outcome, either party can seek appropriate relief.

Contact List for Escalation: Types 2 – 6 Changes

NOTE: Escalations should be made according to the following list:

Escalation Level	Name and Title	Office Number	Email Address
1 st Level	Valerie Cottingham Director Change Control Process	205-321-2168	Valerie.Cottingham@bridge.bellsouth.com
2 nd Level	Dennis Davis OAVP (Encore Solution Delivery, Test Bed, User Requirements, CCP)	205-977-1103	Dennis.L.Davis@bridge.bellsouth.com
	Allan Tarr OAVP (Business Rules/Operations Issues)	404-927-7372	Allan.F.Tarr@bridge.bellsouth.com
	Suzie Lavett OAVP (TAG/LENS)	205-977-2876	Suzie.H.Lavett@bridge.bellsouth.com
	Audrey Thomas OAVP (EDI)	404-927-7886	Audrey.Thomas@bridge.bellsouth.com
	Al Bolden OAVP (LNP)	404-927-7011	Al.Bolden2@bridge.bellsouth.com
3 rd Level	Martha-Sue Blythe Senior Director (for Systems Issues)	404-927-7505	Marthasue.Blythe@bridge.bellsouth.com
	Dee Freeman-Butler Senior Director (for Business Rules/Operations Issues)	404-927-3545	Dee.Freeman2@bridge.bellsouth.com

Dispute Resolution Process

Guidelines

In the event that an issue is not resolved through the Escalation Process as described herein, including (1) escalation within each company to the person with ultimate authority for Change Control operations, and (2) the services of a joint investigative team, when appropriate, comprised of representatives from BellSouth and the affected CLECs. Resolution of the dispute shall be accomplished as set forth below:

- Either BellSouth or any CLEC affected by the dispute may request mediation through the State Public Service Commission, if available. If mediation is requested, parties shall participate in good faith. If the mediation results in the resolution of the dispute, that resolution shall apply to all CLECs affected by the dispute.
- Without necessity for prior mediation, either BellSouth or any CLEC affected by the dispute may file a formal complaint with the appropriate state regulatory agency, requesting resolution of the issue.

ATTACHMENT 11

QUESTION 11. Please provide an update on discussions concerning ensuring that appropriate IT personnel attend the change control process (CCP) meetings.

ANSWER

In an effort to respond positively to CLEC requests for attendance by IT personnel, and without unduly compromising the efficiency or ability for IT to accomplish its responsibilities, BellSouth has assigned Jill Williamson, Senior Director-IT, to attend and represent IT in the CCP. As a former CLEC employee who served as that CLEC's representative to the CCP, Ms. Williamson has an in-depth knowledge of the CCP – including its historical evolution. In her current role with BellSouth, she is intimately familiar with BellSouth's OSS and interactions, and has first-hand involvement in the majority of the projects and issues before the CCP. Although Ms. Williamson has been a standing member of the BellSouth Change Management Team since January 2002, she has been involved in CCP issues behind the scenes since mid-2001.

In addition to Ms. Williamson's involvement in the CCP, in order to be responsive to CLEC concerns, Information Technology personnel associated with particular issues will attend CCP meetings on an as needed basis. In addition, in the proceeding before the Georgia Public Service Commission, BellSouth has proposed and will begin holding a quarterly CLEC/BellSouth technical meeting (if CLECS are agreeable), one purpose of which will be for CLEC and BellSouth IT personnel to discuss issues associated with software releases (upcoming and implemented). BellSouth will make IT personnel available to discuss these releases and expects that CLECs will also make IT personnel available for these quarterly meetings.

ATTACHMENT 12

QUESTION 12.

- a. Please provide a clear explanation of how BellSouth calculates the FOC/Reject Completeness-Multiple Responses metric.
- b. Please explain why BellSouth believes the metric is not meaningful.
- c. Please explain why BellSouth does not believe this metric is useful in evaluating the Double FOC status.

ANSWER

a. A Local Service Request (LSR) is defined as a unique combination of the CLEC's Company Code, Purchase Order Number, and Version Number.

FOC and Reject Response Completeness is reported in two separate measurements:

1. *FOC and Reject Response Completeness*

Measures BellSouth's performance in returning a positive response (FOC or reject) to each LSR submitted. It compares the number of LSRs that were FOC'd or rejected to the total number of LSRs received in the report period.

2. *FOC and Reject Response Completeness - Multiple Responses*

Measures BellSouth's performance in returning *only one* positive response (FOC or reject) to each LSR that received a response. It compares the number of LSRs that were FOC'd or rejected *only once* to the total number of LSRs that were FOC'd or rejected. The denominator in this measure equals the numerator in the above measure.

Example:

Number of LSRs received in report period	100
Number of LSRs FOC'd or rejected	99
Number of LSRs FOC'd or rejected and FOC'd or rejected only once	90

FOC and Reject Response Completeness	(99/100)	99.0%
FOC and Reject Response Completeness - Multiple Responses	(90/99)	90.9%

The percentage of LSRs receiving more than one response is 9.1%. This portion of O-11 actually reports LSRs that receive only one response. The current GA SQM refers to it as "Not Expected"; the MSS describes it as "Multiple Responses."

The FL-ordered SQM has removed the "Not Expected" or "Multiple Responses" portion of O-11. Although a new GA order has not been received, discussions in the workshops indicated strong support for removing this portion of O-11 from the GA SQM, as well.

b. Multiple FOCs may be returned for legitimate reasons. For example, a subsequent FOC may be returned when information on the original FOC has changed, e. g., when the due date changes upon clearance of PF conditions. Additionally, "re-FOCs" may be returned at the request of CLECs and in no way reflect errors on the part of the BellSouth. Therefore, because instances of multiple FOCs do not necessarily represent BellSouth process or performance issues, this metric is not meaningful in assessing BellSouth's service to CLECs.

c. This measurement has been reliable for several months. However, because the measurement includes both FOCs and rejects, it is not useful in evaluating a FOC-specific issue, such as double FOCs. Assessment of the double FOC issue would require analysis of individual records, thus indicating whether or not multiple FOCs were returned on a given LSR.